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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
NAVAZ DOWLING,  
  
Defendant.

2:12-CR-0082-MMD-VCF

**UNOPPOSED MOTION TO CONDUCT A  
PRE-PLEA PRESENTENCE  
INVESTIGATION REPORT AND  
PROPOSED ORDER**

COMES NOW, defendant, NAVAZ DOWLING, by and through his counsel, JAMES A. ORONOV, ESQ., and hereby moves this Court for an Order granting the instant motion for a Pre-Plea Presentence Investigation Report to be prepared by the United States Department of Parole and Probation.

1. It is counsel's understanding that Mr. Dowling has been convicted of a felony offense outside of Nevada. Counsel is unaware of any additional convictions. Accordingly, counsel believes that Mr. Dowling has a Criminal History Category of I. Mr. Dowling's Criminal History Category will drastically impact his sentencing exposure, negotiations, and his decision as to how he should proceed in this matter. A pre-plea presentence investigation report will promote judicial economy and aid in the manner in which this case is timely resolved.

2. Therefore, undersigned counsel respectfully requests this Court issue an Order directing the United States Department of Parole & Probation to conduct a pre-plea presentence investigation report as soon as possible.

3. Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney Kimberly Frayn, regarding this request and she has no opposition.

DATED this 8<sup>th</sup> day of August, 2012.

/s/ James A. Oronoz  
JAMES A. ORONOZ, Esq.  
700 South 3<sup>rd</sup> Street  
Las Vegas, NV 89101  
*Counsel for Navaz Dowling*

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## ORDER

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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that I am an employee of Oronoz & Ericsson L.L.C. and is a person of such age and discretion as to be competent to serve papers.

That on August 8, 2012, I served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to the person(s) named below:

DANIEL G. BOGDEN  
United States Attorney  
333 Las Vegas Blvd. South, #5000  
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*Counsel for United States*

KIMBERLY FRAYN  
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/s/ Lucas Gaffney, Esq.  
Employee of Oronoz & Ericsson L.L.C.